



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm 206, PO Box 40908 * Olympia, Washington 98504-0908 * (360) 753-1111 * Fax (360) 753-1112
Toll Free 1-877-601-2828 * E-mail: pdc@pdc.wa.gov * Website: www.pdc.wa.gov

April 10, 2006

MARGARET SOTH
523 13TH ST
SNOHOMISH WA 98290

Subject: Complaint Filed Against Citizens for Open Government – PDC Case No. 06-283

Dear Ms. Soth:

The Public Disclosure Commission (PDC) staff has completed its investigation of your complaints received October 31 and November 1, 2005 alleging that Citizens for Open Government did not include complete sponsor identification on its political advertising, an alleged violation of RCW 42.17.510(1) and (2).

The PDC staff reviewed your allegation in light of the following statute and administrative rule:

RCW 42.17.510(1) states in part: All political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address."

RCW 42.17.510(2) requires political advertisements undertaken as independent expenditures by a person or entity, other than a party organization, to include a "NOTICE TO VOTERS" and a listing of the sponsor's "Top Five Contributors."

WAC 390-18-010(4) requires printed advertising to clearly state, in an area set apart from any other printed matter, that the advertisement has been paid for by the sponsor, and to include the street address, city, state and zip code.

You alleged that Citizens for Open Government sponsored political advertising opposing Liz Loomis and supporting Doug Thorndike that were independent expenditures and did not include complete sponsor identification. You alleged that the advertising failed to include the required "NOTICE TO VOTERS" and a listing of its top five contributors as required by RCW 42.17.510(2).



We found that:

- Liz Loomis and Doug Thorndike were candidates for Snohomish City Council in the 2005 general election. The reporting requirements relating to the financing of election campaigns did not apply to Mr. Thorndike and Ms. Loomis because the City of Snohomish had fewer than 5,000 registered voters as of the last general election.
- Citizens for Open Government produced four separate mailers supporting the Doug Thorndike campaign and opposing the Liz Loomis campaign.
- Doug Thorndike coordinated his campaign efforts with Citizens for Open Government. Therefore, the mailers were in-kind contributions to Mr. Thorndike's campaign, not independent expenditures. Thus, Citizens for Open Government was not required to include a "NOTICE TO VOTERS" or a listing of its top five contributors.
- The four mailers included the name and address of the sponsor, but did not include an explicit statement of sponsor identification beginning with the words, "paid for by" or "sponsored by" as required by WAC 390-18-010(4).

In accordance with standard PDC practice, Citizens for Open Government was sent a sponsor identification warning letter for failing to include a complete sponsor identification. Thus, no additional enforcement action is warranted in this case.

After a careful review of the alleged violations and relevant facts, we have concluded our investigation and, with the concurrence of the Chair of the Public Disclosure Commission, I am dismissing your complaint against Citizens for Open Government. They are being notified of this dismissal by separate letter.

If you have questions, please contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll free at 1-877-601-2828.

Sincerely,

A handwritten signature in black ink, appearing to read "Vicki Rippie". The signature is fluid and cursive, with a large loop at the end.

Vicki Rippie
Executive Director